

Filed Under Seal

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
NASYR HARMON-CATLIN : **VIOLATIONS:**
: **18 U.S.C. § 924(a)(1)(A) (making false**
: **statements to a federal firearms licensee – 28**
: **counts)**
: **Notice of forfeiture**

INDICTMENT

COUNTS ONE THROUGH TWENTY-EIGHT

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. King Shooters Supply, located at 346 East Church Road, King of Prussia, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
2. The Bunker Gun Shop, located at 549 York Road, Warminster, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
3. Tanner’s Sports Center, located at 2301 York Road, Jamison, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
4. Founding Fathers Outfitters, located at 9280 Ridge Pike, Lafayette Hill, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.

5. The Bunker Gun Shop II, located at 143 East Butler Avenue, Chalfont, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.

6. Firearms 4 Less, LLC, located at 119 Carbon Street, Easton, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.

7. The Guardian Training Center, located at 1528 Campus Drive, Warminster, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.

8. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

9. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 (“Form 4473”). Part of the Form 4473 requires that the prospective purchaser certify that all of his or her answers on Form 4473 are true and correct. The Form 4473 contains language warning that, “I understand that answering ‘yes’ to question 11.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law,” “making any false oral or written statement, or the exhibiting of any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony,” and “I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a Federal firearms license is a violation of Federal law.”

10. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth, to ensure that the person was not prohibited from purchasing a firearm. For example, convicted felons are persons prohibited by law from buying firearms.

11. On or about the dates listed below, each date constituting a separate count of this indictment, in King of Prussia, Jamison, Lafayette Hill, Chalfont, Easton, and Warminster, each in the Eastern District of Pennsylvania, defendant

NASYR HARMON-CATLIN,

in connection with the acquisition of each of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders' records, in that defendant HARMON-CATLIN, certified on the Form 4473 that he was the actual transferee/buyer of the firearm(s), and that his address was 1803 S 57th Street, Philadelphia, Pennsylvania, when in fact, as defendant knew, these statements were false and fictitious, because HARMON-CATLIN was purchasing the firearms on behalf of another person, and because he did not reside at 1803 S 57th Street, Philadelphia, Pennsylvania:

Count	Date and Dealer	Firearm(s)	Serial Number
One	August 21, 2020 King Shooters Supply 346 East Church Road, King of Prussia, Pennsylvania	Taurus, Model G2C, 9mm semi-automatic pistol	ABH776264
Two	August 26, 2020 King Shooters Supply 346 East Church Road, King of Prussia, Pennsylvania	Glock, Model 45, 9mm semi-automatic pistol	BMFE327

Three	August 31, 2020 The Bunker Gun Shop 549 York Road Warminster, Pennsylvania	Glock, Model 36, .45 caliber semi-automatic pistol	BABL341
Four	September 14, 2020 King Shooters Supply 346 East Church Road, King of Prussia, Pennsylvania	Military Armament, Model MA0A1, 9mm semi-automatic pistol	S6033595
Five	September 14, 2020 Tanner's Sports Center 2301 York Road Jamison, Pennsylvania	Glock, Model 31, .357 caliber semi-automatic pistol	VNV404
Six	September 16, 2020 Founding Fathers Outfitters 9280 Ridge Pike Lafayette Hill, Pennsylvania	Ruger, Model 57, 5.7 x 28mm semi-automatic pistol	64142158
Seven	September 22, 2020 King Shooters Supply 346 East Church Road, King of Prussia, Pennsylvania	Glock, Model 26, 9mm semi-automatic pistol	WZZ115
Eight	September 30, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 30, .40 caliber semi-automatic pistol	ABKK518
Nine	October 1, 2020 King Shooters Supply 346 East Church Road, King of Prussia, Pennsylvania	Glock, Model 26, 9mm semi-automatic pistol	PKM076
Ten	October 4, 2020 Firearms 4 Less, LLC 119 Carbon Street Easton, Pennsylvania	Spikes Tactical, Model ST-15, 5.56 semi- automatic rifle; and Glock, Model 29, 10mm semi-automatic pistol	NSL015860 BPUP757
Eleven	October 6, 2020 The Bunker Gun Shop 549 York Road Warminster, Pennsylvania	Century Arms Inc., Model Micro Draco, 7.62x39mm semi-automatic pistol	PMD2114820

Twelve	October 8, 2020 Founding Fathers Outfitters 9280 Ridge Pike Lafayette Hill, Pennsylvania	Springfield, Model XD9 Defender, 9mm semi- automatic pistol	BY299957
Thirteen	October 13, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 19, 9mm semi-automatic pistol; and Springfield, Model XDS, 9mm semi-automatic pistol	BFMH492 S3995793
Fourteen	October 19, 2020 Tanner's Sports Center 2301 York Road Jamison, Pennsylvania	Glock, Model 22, .40 caliber semi-automatic pistol	AANU429
Fifteen	October 26, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 17, 9mm semi-automatic pistol; and Smith & Wesson, Model M&P 40, .40 caliber semi- automatic pistol	BDTU801 JFM3379
Sixteen	November 2, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 32, .357 caliber semi-automatic pistol; Smith & Wesson, Model M&P 45, .45 caliber semi- automatic pistol; and Century Arms Inc., Model Micro Draco, 7.62x39mm semi-automatic pistol	BRHA456 HUK0635 PMD0530518RO
Seventeen	November 5, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 17, 9mm semi-automatic pistol; and Glock, Model 45, 9mm semi-automatic pistol	BREC152 BRKD972
Eighteen	November 9, 2020 The Bunker Gun Shop 549 York Road Warminster, Pennsylvania	Sig Sauer, Model 365XL, 9mm semi-automatic pistol	66B095361

Nineteen	November 16, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Springfield, Model XD, .40 caliber semi-automatic pistol;	BY447313
		Glock, Model 17, 9mm semi-automatic pistol; and	BRDB636
		Glock, Model 36, .45 caliber semi-automatic pistol	BRHE516
Twenty	November 18, 2020 Guardian Training Center 1528 Campus Drive, Warminster, Pennsylvania	Glock, Model 33, .357 caliber semi-automatic pistol; and	BRAH903
		Springfield, Model XD, .45 caliber	BY465218
Twenty-One	November 24, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Ruger, Model 57, 5.7 x 28mm semi-automatic pistol; and	641-63862
		Springfield, Model XD, .45 caliber semi-automatic pistol	BY468499
Twenty-Two	November 27, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 30, .45 caliber semi-automatic pistol;	HLE783
		Glock, Model 20, 10mm semi-automatic pistol;	VLH740
		Smith & Wesson, Model M&P Shield, .45 caliber semi-automatic pistol; and	JDV7508
		Rossi, Model 38, .38 caliber semi-automatic pistol	YD70834
Twenty-Three	December 1, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Springfield, Model XD, .40 caliber semi-automatic pistol; and	BY447395
		Beretta, Model APX, 9mm semi-automatic pistol	A109471X

Twenty-Four	December 4, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 19, 9mm semi-automatic pistol; and	BPXF397
		Glock, Model 23, .40 caliber semi-automatic pistol	BRRP476
Twenty-Five	December 12, 2020 Tanner's Sports Center 2301 York Road Jamison, Pennsylvania	Springfield, Model XD 40, .40 caliber semi- automatic pistol; and	GM1070851
		Springfield, Model XDM, .45 caliber semi-automatic pistol	MG689520
Twenty-Six	December 16, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Smith & Wesson, Model 642, .38 caliber semi- automatic revolver;	DMW4552
		Glock, Model 30, .45 caliber semi-automatic pistol; and	BRZM344
		Glock, Model 23, .40 caliber semi-automatic pistol	BRRP270
Twenty-Seven	December 18, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 22, .40 caliber semi-automatic pistol;	BRRN100
		Glock, Model 43, 9mm semi-automatic pistol; and	BHPY746
		Glock, Model 19, 9mm semi-automatic pistol	BGVU470
Twenty-Eight	December 21, 2020 The Bunker Gun Shop II 143 East Butler Avenue Chalfont, Pennsylvania	Glock, Model 36, .45 caliber semi-automatic pistol; and	BABL921
		Walther, Model PPS, 9mm semi-automatic pistol	AL5566

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A) set forth in this indictment, defendant

NASYR HARMON-CATLIN

shall forfeit to the United States of America, the firearms and other items involved in the commission of such violations, including, but not limited to:

- 1) A Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number ABH776264;
- 2) A Glock, Model 45, 9mm semi-automatic pistol, bearing serial number BMFE327;
- 3) A Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BABL341;
- 4) A Military Armament, Model MA0A1, 9mm semi-automatic pistol, bearing serial number S6033595;
- 5) A Glock, Model 31, .357 caliber semi-automatic pistol, bearing serial number VNV404;
- 6) A Ruger, Model 57, 5.7 x 28mm semi-automatic pistol, bearing serial number 64142158;
- 7) A Glock, Model 26, 9mm semi-automatic pistol, bearing serial number WZZ115;
- 8) A Glock, Model 30, .40 caliber semi-automatic pistol, bearing serial number ABKK518;

- 9) A Glock, Model 26, 9mm semi-automatic pistol, bearing serial number PKM076;
- 10) A Spikes Tactical, Model ST-15, 5.56 semi-automatic rifle, bearing serial number NSL015860;
- 11) A Glock, Model 29, 10mm semi-automatic pistol, bearing serial number BPUP757;
- 12) A Century Arms Inc., Model Micro Draco, 7.62x39mm semi-automatic pistol, bearing serial number PMD2114820;
- 13) A Springfield, Model XD9 Defender, 9mm semi-automatic pistol, bearing serial number BY299957;
- 14) A Glock, Model 19, 9mm semi-automatic pistol, bearing serial number BFMH492;
- 15) A Springfield, Model XDS, 9mm semi-automatic pistol, bearing serial number S3995793;
- 16) A Glock, Model 22, .40 caliber semi-automatic pistol, bearing serial number AANU429;
- 17) A Glock, Model 17, 9mm semi-automatic pistol, bearing serial number BDTU801;
- 18) A Smith & Wesson, Model M&P 40, .40 caliber semi-automatic pistol, bearing serial number JFM3379;
- 19) A Glock, Model 32, .357 caliber semi-automatic pistol, bearing serial number BRHA456;

- 20) A Smith & Wesson, Model M&P 45, .45 caliber semi-automatic pistol, bearing serial number HUK0635;
- 21) A Century Arms Inc., Model Micro Draco, 7.62x39mm semi-automatic pistol, bearing serial number PMD0530518RO;
- 22) A Glock, Model 17, 9mm semi-automatic pistol, bearing serial number, bearing serial number BREC152;
- 23) A Glock, Model 45, 9mm semi-automatic pistol, bearing serial number, bearing serial number BRKD972;
- 24) A Sig Sauer, Model 365XL, 9mm semi-automatic pistol, bearing serial number 66B095361;
- 25) A Springfield, Model XD, .40 caliber semi-automatic pistol, bearing serial number BY447313;
- 26) A Glock, Model 17, 9mm semi-automatic pistol, bearing serial number BRDB636;
- 27) A Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BRHE516;
- 28) A Glock, Model 33, .357 caliber semi-automatic pistol, bearing serial number BRAH903;
- 29) A Springfield, Model XD, .45 caliber, bearing serial number BY465218;
- 30) A Ruger, Model 57, 5.7 x 28mm semi-automatic pistol, bearing serial number 641-63862;
- 31) A Springfield, Model XD, .45 caliber semi-automatic pistol, bearing serial number BY468499;

- 32) A Glock, Model 30, .45 caliber semi-automatic pistol, bearing serial number HLE783;
- 33) A Glock, Model 20, 10mm semi-automatic pistol, bearing serial number VLH740;
- 34) A Smith & Wesson, Model M&P Shield, .45 caliber semi-automatic pistol, bearing serial number JDV7508;
- 35) A Rossi, Model 38, .38 caliber semi-automatic pistol, bearing serial number YD70834;
- 36) A Springfield, Model XD, .40 caliber semi-automatic pistol, bearing serial number BY447395;
- 37) A Beretta, Model APX, 9mm semi-automatic pistol, bearing serial number A109471X;
- 38) A Glock, Model 19, 9mm semi-automatic pistol, bearing serial number BPXF397;
- 39) A Glock, Model 23, .40 caliber semi-automatic pistol, bearing serial number BRRP476;
- 40) A Springfield, Model XD40, .40 caliber semi-automatic pistol, bearing serial number GM1070851;
- 41) A Springfield, Model XDM, .45 caliber semi-automatic pistol, bearing serial number MG689520;
- 42) A Smith & Wesson, Model 642, .38 caliber semi-automatic revolver, bearing serial number DMW4552;

43) A Glock, Model 30, .45 caliber semi-automatic pistol, bearing serial number BRZM344;

44) A Glock, Model 23, .40 caliber semi-automatic pistol, bearing serial number BRRP270;

45) A Glock, Model 22, .40 caliber semi-automatic pistol, bearing serial number BRRN100;

46) A Glock, Model 43, 9mm semi-automatic pistol, bearing serial number BHPY746;

47) A Glock, Model 19, 9mm semi-automatic pistol, bearing serial number BGVU470;

48) A Glock, Model 36, .45 caliber semi-automatic pistol, bearing serial number BABL921; and

49) A Walther, Model PPS, 9mm semi-automatic pistol, bearing serial number AL5566.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:


GRAND JURY FOREPERSON


JENNIFER ARBITTIER WILLIAMS
ACTING UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

NASYR HARMON-CATLIN

INDICTMENT

Counts

18 U.S.C. §§ 922(a)(1)(A), 924(a)(1)(D) (dealing in firearms without a license – 1 count)
18 U.S.C. § 924(a)(1)(A) (making false statements to a federal firearms licensee – 6 counts)
Notice of Forfeiture

A true bill.

Foreman

Filed in open court this 19 day,
Of October A.D. 20 21

Clerk

Bail, \$ _____
